

From: [Casey, Carolyn](#)
To: [Craig Ziady](#)
Cc: [Bruce Hoskins](#); [Steve Drohosky](#); [Zucker, Audrey](#); [Wainberg, Daniel](#); [Murphy, Jim](#); [Miano, John \(DEP\)](#)
Subject: RE: Notice of sampling - indoor air - request for expedited scheduling
Date: Monday, July 16, 2018 3:15:00 PM

Sampling this week would be fine. Please let me know dates, times and locations in advance.
Thank you,
Carolyn

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Monday, July 16, 2018 1:55 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Steve Drohosky <sjd@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; Miano, John (DEP) <john.miano@state.ma.us>
Subject: RE: Notice of sampling - indoor air - request for expedited scheduling

Hi Carolyn – Thank you for the extension until August 30 for the July progress report. Appreciated.

With regard to the indoor air sampling in nearby suites, please confirm whether EPA authorizes such sampling to be conducted this week or whether you hold firm to the three-week period set forth in the Consent Order?

We are aware of the guidance and appreciate that there are different approaches to take here, including that reasonable minds might differ as to the sequence of activities or even which is preferred/desirable. Nevertheless, we are interested in obtaining more data, which will be of some assistance (how much remains to be determined) in drawing conclusions and formulating an action plan.

Thank you.

Craig J. Ziady
General Counsel
Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801
Direct dial: 781-932-7034
Main No.: 781-935-8000
www.cummings.com

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From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Monday, July 16, 2018 11:11 AM

To: Craig Ziady

Cc: Bruce Hoskins; Steve Drohosky; Zucker, Audrey; Wainberg, Daniel; Murphy, Jim; Miano, John (DEP)

Subject: RE: Notice of sampling - indoor air - request for expedited scheduling

Thank you for the progress report and revised schedule. The delay in submitting the next progress report to Aug 30 is fine.

Regarding the vague proposal below, to investigate potential interior sources by conducting indoor air sampling in a number of suites/areas proximate to the suites where day care centers/schools are currently located, it is not clear how this additional sampling will provide the necessary data to identify indoor air sources. If similar contamination is identified in indoor air samples collected in adjacent suites, without other lines of evidence (sub-slab soil gas and outdoor ambient air samples), it may just indicate the vapor intrusion is also occurring in these suites as well. Please refer to the EPA and MassDEP vapor intrusion guidance documents for appropriate procedures for identifying and evaluating confounding sources. Focus on identifying sub-slab sources of vapor intrusion, identifying preferential pathways for vapor intrusion, and/or conducting actual mitigation makes more sense.

<https://www.epa.gov/sites/production/files/2015-09/documents/oswer-vapor-intrusion-technical-guide-final.pdf>

Refer to section 6.3.5 Identify and Evaluate Contributions from Indoor and Ambient Air Sources

Thank you,
Carolyn

Carolyn J. Casey
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail code OSRR 07-3
Boston, MA 02109-3912
P 617-918-1368
F 617-918-0368
casey.carolyn@epa.gov

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, July 13, 2018 3:10 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; Miano, John (DEP) <john.miano@state.ma.us>

Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Steve Drohosky <sjd@cummings.com>

Subject: Notice of sampling - indoor air - request for expedited scheduling

Hi Carolyn – As you may have seen in the revised schedule we transmitted earlier today, we are planning, as part of our investigation of potential interior sources, on conducting indoor air sampling

in a number of suites/areas proximate to the suites where day care centers/schools are currently located.

This correspondence constitutes our formal notice, pursuant to Section IX.17.k of the Consent Order, of such sampling during the week of August 6, 2018.

Notwithstanding such notice, please advise as soon as possible whether EPA is willing to authorize such indoor air sampling (with 24-hour summa canisters) forthwith (i.e., next week) rather than waiting the 21 days provided in the Consent Order? We believe that the exploration for potential interior sources is a critical component to the ongoing assessment work and would like to avoid any delays in proceeding with such work.

Thank you in advance.

Craig

Craig J. Ziady
General Counsel
Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801
Direct dial: 781-932-7034
Main No.: 781-935-8000
www.cummings.com

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